

REMARKS

Prior to this response, claims 1, 2, 4 and 6-20 were pending in this application. No claims have been added, amended, or canceled by this response. Applicants respectfully request reconsideration of this application in view of the following remarks.

35 U.S.C. § 103(a) Rejection - Ahuja, Lindbo, Farber

Claims 1, 2, 4 and 6-20 were rejected under 35 U.S.C. § 103(a) as being unpatentable over US Patent No. 6,175,869 to Ahuja et al. ("Ahuja") in view of US Patent No. 6,581,090 to Lindbo et al. ("Lindbo") and further in view of US Patent No. 6,185,598 to Farber et al. ("Farber"). Applicants respectfully traverse as the references fail to teach or suggest all of the recitations of these claims.

Claims 1, 2, 4, 6

Claim 1 recites "a preference list originating from the client computer." The preference list comprises at least one of the first address of a first content cache and a second address of a second cache. Claim 1 further recites a directory located remote to the client computer. The directory maps at least one of the content object, the first copy, and the second copy to the client computer. The directory is affected by the preference list. Applicants respectfully submit these recitations are not taught or suggested by the references.

As stated in the Office Action, neither Ahuja, nor Lindbo, disclose a preference list as recited by claim 1. Farber also fails to disclose a preference list, originating from a client computer, which comprises a first address of a content cache and/or a second address of a second content cache. In Farber, a client sends a request to an origin server for a particular resource. Farber, col. 2, l. 65-67. A reflector, co-located with the origin server, intercepts the request and either decides the request should be handled locally or at a repeater. Id., col. 3, ll. 5-10. In contrast to claim 1, Farber fails to disclose that a preference list originates from a client

computer. The client in Farber only originates a request for a resource (e.g., HTTP request), not a preference list.

The references also fail to disclose a directory as recited by claim 1. The directory in claim 1 recites a directory affected by the preference list originating from a client computer. As none of the references teach or suggest the preference list, the references also fail to teach or suggest a directory affected by the preference list.

Additionally, the directory as recited by claim 1 maps at least one of a content object, a first copy of the content object located at a first content cache and a second copy of the content object located at the second content cache to a client computer. In Ahuja, a client agent intercepts client requests and routes them to a particular server in replicated pool of servers. Ahuja, col. 2, ll. 18-24. The client has a dispatching mechanism which is responsible for routing requests to the server pool. Id., col. 4, l. 64 - col. 5, l. 4. Unlike claim 1, the dispatching mechanism does not have a directory which maps the client computer to a content object or a copy of a content object. The dispatching mechanism merely redirects a client request to a particular server in a replicated pool. Applicants respectfully submit that Ahuja does not disclose a directory as recited by claim 1. The other references also fail to disclose the directory.

As the cited references fail to teach or suggest the recitations of claim 1 discussed above, Applicants respectfully submit claim 1 is allowable. Applicants also respectfully submit that dependent claims 2, 4 and 6 are also allowable for at least the same reasons.

Applicants also believe that the dependent claims are allowable for additional reasons. Claim 2 recites a routing mechanism that maps one of the content object, the first copy, and the second copy to the client computer. As will be discussed in more detail with reference to claim 14, Applicants believe these recitations are not taught or suggested by the references.

Claim 4 recites that the server periodically delivers a catalog of content objects to the directory. In Ahuja, a dispatching mechanism of a client intercepts client requests and routes

them to a server in a replicated pool of servers. Ahuja, col. 2, ll. 21-28. Ahuja fails to disclose that any of the servers delivers a catalog of content objects. In fact, it is not necessary for the dispatching mechanism to know the particular content on the servers, only that they are part of a replicated pool. The other references also fail to disclose this recitation of claim 4.

Claim 6 recites that the content object comprises a first portion and a second portion. The first portion is stored on the first content cache and not the second content cache and the second portion is stored on the second content cache and not the first content cache. The Office Action states this is disclosed by Ahuja. However, Ahuja discloses replicated server. A request may be made for a subset of the content. Ahuja, col. 3, ll. 61-64; col. 4, ll. 31-36. However, as understood by Applicants, the content on each of the servers is replicated on the other servers and a particular server does not have any portions which are not on the other servers.

Claims 7-13

Claim 7 recites a user-viewable directory that maps one of a first copy of a content object located at a first content cache and a second copy of a content object located at a second content cache to the client computer. The Office Action relies on the dispatching mechanism in Ahuja to disclose these recitations. However, as discussed above with reference to claim 1, Applicants believe that Ahuja fails to disclose a directory which maps a client computer to a first or second copy of a content object. Even assuming that the dispatching mechanism can be equated with the directory of claim 7, there is no suggestion in Ahuja that the information maintained by the dispatching mechanism is user-viewable. Accordingly, Applicants respectfully submit that claim 7, and its dependent claims 8-13, are allowable.

Applicants also respectfully submit that the dependent claims are allowable for additional reasons. Claims 8 and 9 contain some of the recitations similar to recitations discussed above with claim 1; claim 10 contains recitations similar to those discussed below with reference to claim 14; claim 12 contains recitations similar to those discussed above with

reference to claim 4; and claim 13 contains recitations similar to those discussed above with reference to claim 6. Accordingly, Applicants believe these claims are also allowable for the additional reasons discussed with reference to the aforementioned claims.

Claims 14-20

Claim 14 recites a routing mechanism that maps a content portion, a first copy of the content portion, and a second copy of the content portion to client computer. The dispatching mechanism of Ahuja redirects a client computer to a particular server in a replicated pool of servers. The dispatching mechanism does not map a particular content portion to the client computer. As the other references also fail to teach or suggest a routing mechanism as recited by claim 14, Applicants respectfully submit claim 14 is allowable. Applicants also respectfully submit that dependent claims 15-20 are allowable for at least the same reason. Additionally, many of these dependent claims contain recitations similar to those discussed elsewhere in this Response and are thus believed to also be allowable for the additional reasons discussed with reference to other claims.

Motivate to Combine

Applicants also respectfully note that citations do not appear to have been provided for the motivation to combine the references. Because there is no cite, it is unclear to the Applicant where the motivation to combine comes from. The Office is respectfully requested to clarify if Official Notice is the source of this motivation. Should the rejection be maintained and Official Notice is relied upon, an express showing of proof is respectfully requested as set forth in MPEP 2144.03.

INVITATION FOR A TELEPHONE INTERVIEW

If there remains any issue of allowance with this application, Applicants respectfully request the Examiner telephone the undersigned at 303-571-4000.

Application No. 09/665,204
Amendment dated January 18, 2005
Amendment under 37 CFR 1.116 Expedited Procedure
Examining Group 2141

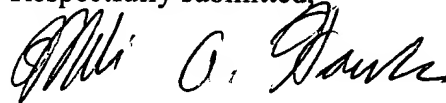
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CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

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Respectfully submitted,



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